

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG, ABBOTT
BIORESEARCH CENTER, INC., ABBOTT
BIOTECHNOLOGY, LTD.

Plaintiffs,

v.

CENTOCOR ORTHO BIOTECH, INC.,
CENTOCOR BIOLOGICS, LLC.

Defendants.

)
)
)
) C.A. No. 4:09-CV-11340 (FDS)
)

)
) JURY TRIAL DEMANDED
)
)
)
)
)
)
)
)
)

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' WITNESS LIST

The Abbott Plaintiffs hereby disclose the following objections to the Centocor Defendants' witness list of August 29, 2012.

A. Witnesses Centocor Expects to Call Live at Trial

1. Abbott Objects to Centocor's Calling of Michael Grusby as a Trial Witness

Abbott objects to the testimony of Abbott claim construction expert Dr. Michael Grusby as set forth in Abbott's Motion *in Limine* No. 7, filed on August 3, 2012.

2. Abbott Objects to Centocor's Calling of Susan Lacy as a Trial Witness

Abbott objects to the testimony of Abbott employee Susan Lacy to the extent it is the subject of Abbott's Motion *in Limine* No. 1, filed on August 2, 2012.

3. Abbott Objects to Centocor's Calling of Daniel Tracey as a Trial Witness

Abbott objects to the testimony of Abbott inventor Dr. Daniel Tracey to the extent it is the subject of Abbott's Motion *in Limine* No. 1, filed on August 3, 2012.

B. Witnesses Centocor May Call at Trial if the Need Arises

1. Abbott Objects to Centocor's Calling of Paul Sakorafas as a Trial Witness

Abbott objects to the testimony of Abbott inventor Paul Sakorafas to the extent it is the subject of Abbott's Motion *in Limine* No. 1, filed on August 3, 2012.

2. Abbott Objects to Centocor's Calling of Zehra Kaymakcalan as a Trial Witness

Abbott objects to the testimony of Abbott inventor Dr. Zehra Kaymakcalan to the extent it is the subject of Abbott's Motion *in Limine* No. 1, filed on August 3, 2012.

C. Witnesses Whose Testimony is Expected to be Presented by Deposition

Abbott hereby incorporates its objections to Centocor's Affirmative Deposition Designations, served simultaneously herewith.

Abbott also objects to the testimony of these witnesses to the extent it is the subject of any of Abbott's Motions *in Limine*, filed on August 3, 2012. (D.I. 383, 384.)

D. Witnesses Whose Testimony May be Presented by Deposition if the Need Arises

1. Abbott Objects to Centocor's Presenting Testimony of Zehra Kaymakcalan by Deposition

Abbott objects to deposition testimony of Abbott inventor Dr. Zehra Kaymakcalan, because Centocor has never served affirmative deposition designations of her testimony.

Abbott further objects to the testimony of Dr. Kaymakcalan to the extent it is the subject of Abbott's Motion *in Limine* No. 1, filed on August 3, 2012.

Dated: August 29, 2012

Respectfully Submitted,

/s/ Robert J. Gunther, Jr.

Robert J. Gunther, Jr. (admitted *pro hac vice*)

Jane M. Love (admitted *pro hac vice*)

Anne-Marie Yvon (admitted *pro hac vice*)

Violetta G. Watson (admitted *pro hac vice*)

Paula Estrada de Martin (admitted *pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

7 World Trade Center

New York, New York 10007

Tel: (212) 230-8800

Fax: (212) 230-8888

William F. Lee (BBO #291960)

Anne M. McLaughlin (BBO # 666081)

WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Tel: (617) 526-6000
Fax: (617) 526-5000

William G. McElwain (BBO # 332510)
Amy K. Wigmore (admitted *pro hac vice*)
Amanda L. Major (admitted *pro hac vice*)
Jacob S. Oyloe (admitted *pro hac vice*)
Rachel L. Weiner (admitted *pro hac vice*)
WILMER CUTLER PICKERING
HALE and DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Tel: (202) 663-6000
Fax: (202) 663-6363

William W. Kim (admitted *pro hac vice*)
Arthur W. Coviello (admitted *pro hac vice*)
WILMER CUTLER PICKERING
HALE and DORR LLP
950 Page Mill Road
Palo Alto, California 94304
Tel: (650) 858-6000
Fax: (650) 858-6100

*Attorneys for Abbott GmbH & Co., KG,
Abbott Bioresearch Center, Inc., and
Abbott Biotechnology, Ltd.*